

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

PHENIX LONGHORN LLC,

Plaintiff,

v.

AU OPTRONICS CORPORATION,  
HISENSE ELECTRONICA MEXICO,  
S.A. DE C.V., HISENSE USA  
CORPORATION, HISENSE VISUAL  
TECHNOLOGY CO., LTD., and DOES 1–10,

Defendants.

**CIVIL CASE NO. 2:23-cv-00477-RWS-RSP**

**JURY TRIAL DEMANDED**

PHENIX LONGHORN LLC,

Plaintiff,

v.

INNOLUX CORPORATION and  
DOES 1–10,

Defendants.

**CIVIL CASE NO. 2:23-cv-00478-RWS-RSP**

**JURY TRIAL DEMANDED**

**DECLARATION OF RODNEY MILLER IN SUPPORT OF PLAINTIFF  
PHENIX LONGHORN LLC’S OPENING CLAIM CONSTRUCTION BRIEF**

I, Rodney Miller, being over the age of 18 and competent to make the declarations herein,  
do hereby declare that:

I am one of the attorneys representing Phenix Longhorn LLC (“Phenix”) in this matter. I  
submit this Declaration in support of Phenix’s Opening Claim Construction Brief.

<b>Exhibit Number</b>	<b>Description</b>
A	Attached hereto as Exhibit A is a true and correct copy of U.S. Patent No. 7,233,305 (the “’305 Patent”)

Exhibit Number	Description
B	Attached hereto as Exhibit B is a true and correct copy of U.S. Patent No. 7,557,788 (the “’788 Patent”)
C	Attached hereto as Exhibit C is a true and correct copy of <i>Phenix Longhorn LLC v. Wistron Corp. et al.</i> , No. 2:17-CV-00711-RWS, Claim Construction Memorandum and Order, dated June 21, 2019
D	Attached hereto as Exhibit D is a true and correct copy of the June 12, 2025 Deposition Transcript of Dr. Paul S. Min
E	Attached hereto as Exhibit E is a true and correct copy of <i>Wistron Corp. v. Phenix Longhorn, LLC</i> , IPR2018-01255, Decision Denying Institution of <i>Inter Partes</i> Review, dated January 24, 2019
F	Attached hereto as Exhibit F is a true and correct copy of the Declaration of Joseph McAlexander in Support of Plaintiff’s Claim Construction Positions Relating to Definiteness, dated May 8, 2025
G	Attached hereto as Exhibit G is a true and correct copy of the Declaration of Dr. Aris Silzars Regarding Claim Construction of US Patent Nos. 7,233,305 and 7,557,788, dated May 8, 2025

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, pursuant to Section 1746 of Title 28 of the United States Code.

Dated: June 24, 2025

/s/ Rodney Miller  
Rodney Miller